

**UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK**

IN RE APPLICATION OF CHANGPENG  
ZHAO FOR AN ORDER TO TAKE  
DISCOVERY FOR USE IN A FOREIGN  
PROCEEDING PURSUANT TO 28 U.S.C.  
§ 1782

Case No. \_\_\_\_ Misc. \_\_\_\_

**APPLICATION AND PETITION OF CHANGPENG ZHAO  
FOR AN ORDER TO TAKE DISCOVERY  
FOR USE IN A FOREIGN PROCEEDING PURSUANT TO 28 U.S.C. § 1782**

Petitioner Changpeng Zhao, pursuant to 28 U.S.C. § 1782 and Federal Rules of Civil Procedure 26, 34, and 45, respectfully applies to this Court for an order authorizing Petitioner to obtain certain limited discovery from Bloomberg L.P. and Bloomberg Inc. (“Bloomberg,” and together with Bloomberg L.P., the “Respondents”) for use in a pending litigation before the Hong Kong Court of First Instance (“Hong Kong Court”). In support of this Application, Petitioner submits a Memorandum of Law and attaches the Declaration of Kei Cheung, Hui (also known as John Hui) (the “Hui Declaration”), the Declaration of Pem C. Tshering (the “Tshering Declaration”) and the Declaration of Natalie Ng (the “Ng Declaration”), each with accompanying exhibits. The Proposed Order is attached as Exhibit A to the Tshering Declaration, the subpoenas *duces tecum* to be served on each of the Respondents are attached as Exhibits B and C to the Tshering Declaration, and the Notices of Deposition to be served on each of the Respondents are attached as Exhibits D and E to the Tshering Declaration.

Dated: New York, New York  
July 25, 2022

Respectfully submitted,

SIDLEY AUSTIN LLP

A handwritten signature in black ink, appearing to read 'Tai-Heng Cheng', is written over a horizontal line.

Tai-Heng Cheng

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